

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF INDIANA
SOUTH BEND DIVISION

In the Matter of

JULIE ANN BRADLEY,

Debtor.

Case No. 22-30657
Chapter 7

MOTION TO COMPEL TURNOVER

Trustee, Jacqueline Sells Homann, moves to compel Debtor to turnover copies of receipts showing her expenditures to Krisor & Associates and Liberty Mutual using tax refund monies and states as follows:

1. Debtor filed her bankruptcy petition on June 23, 2022.
2. The 341 meeting of creditors was held on July 26, 2022.
3. Debtor was asked to provide evidence of her tax refund spending.
4. Trustee has corresponded with Debtor's counsel requesting receipts or bank statements showing how Debtor spent over \$7,000 in tax refund monies between February 24 and June 23, 2022. True and correct copies of the same are attached to this Motion as Exhibit A.

5. Debtor's failure to cooperate with the Trustee in this matter constitutes a violation of her duties pursuant to 11 U.S.C. §521(a)(3) and (4) that requires the Debtor to cooperate with the Trustee, and to assist in the administration of the bankruptcy estate.

Therefore, Trustee prays that the Debtor, Julie Ann Bradley, be compelled to turnover copies of receipts or bank statements showing all payments made to Krisor & Associates and Liberty Mutual, and for all other just and proper relief.

Dated: March 24, 2023

Respectfully submitted,

/s/ Jacqueline Sells Homann
Jacqueline Sells Homann (15462-71)
Chapter 7 Bankruptcy Trustee
1251 North Eddy Street
Suite 203
South Bend, Indiana 46617
Telephone: (574) 575-4321
Email: trustee@athoralaw.com

CERTIFICATE OF SERVICE

I hereby certify that on March 24, 2023 a true and correct copy of the above and foregoing Motion to Compel Turnover was served as follows:

Tamara L. Renner
lawfirm@banikandrenner.com

United States Trustee
ustpregion10.so.ecf@usdoj.gov

Julie Ann Bradley
1109 Court Ln.
Apt B
Goshen, IN 46526

/s/ Jacqueline Sells Homann
Jacqueline Sells Homann

JoAnn Chamberlain

From: Banik & Renner <lawfirm@banikandrenner.com>
Sent: Wednesday, February 15, 2023 12:29 PM
To: JoAnn Chamberlain
Subject: Re: Case: 22-30657 (BRADLEY, JULIE ANN)

Thank you. We have been trying for quite some time. I will continue to do so.

On Wed, Feb 15, 2023 at 11:01 AM JoAnn Chamberlain <Joann@athoralaw.com> wrote:

Dear Attorney Renner,

Good morning. This file came up on Trustee Homann's calendar because she's still waiting for receipts showing the debtor's expenditures to Krisor and Liberty Mutual. Thank you for forwarding that information immediately so we can move this matter forward.

Sincerely,

JoAnn

JoAnn M. Chamberlain

Legal Assistant



joann@athoralaw.com

Athoralaw.com

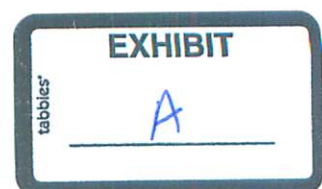
574.575.4321

1251 North Eddy Street, Suite 203

South Bend, Indiana 46617



ATHORA



JoAnn Chamberlain

From: JoAnn Chamberlain
Sent: Wednesday, February 15, 2023 11:01 AM
To: LAWFIRM@BANIKANDRENNER.COM
Subject: Case: 22-30657 (BRADLEY, JULIE ANN)

Dear Attorney Renner,

Good morning. This file came up on Trustee Homann's calendar because she's still waiting for receipts showing the debtor's expenditures to Krisor and Liberty Mutual. Thank you for forwarding that information immediately so we can move this matter forward.

Sincerely,

JoAnn
JoAnn M. Chamberlain
Legal Assistant

@ joann@athoralaw.com

⌚ Athoralaw.com

📞 574.575.4321

📍 1251 North Eddy Street, Suite 203
South Bend, Indiana 46617



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Andrea Cobb

From: Andrea Cobb
Sent: Thursday, August 11, 2022 3:26 PM
To: 'LAWFIRM@BANIKANDRENNER.COM'
Subject: Case: 22-30657 (BRADLEY, JULIE ANN)

Good afternoon Attorney Renner.

Trustee Homann has now had the chance to review how Debtor spent her tax money. She would like to see copies of receipts or checks for the following:

- Krisor Law payment(s);
- Two months rent paid; and
- Liberty Mutual payment(s)

Could you please assist your client in getting those documents to our office?

Thank you.

Andrea L. Cobb

Assistant to Jacqueline Sells Homann, Trustee

Jones Obenchain, LLP

AndreaCobb@jonesobenchain.com

574-233-1194 ext. 140

